

JOHN M. RUNFOLA (CSBN 96058)  
Law Office of John M. Runfola  
Pier 9, Suite 100  
San Francisco, CA 94111  
Telephone: (415) 391-4243  
Facsimile: (415) 391-5161  
john@johnmrunfola.com

Attorney for Defendant  
FRANCISCO TOMAS REUS

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

FRANCISCO TOMAS REUS,

Defendant.

Case No. 21-cr-00161-001-RS

**DEFENDANT FRANCISCO TOMAS  
REUS' SENTENCING MEMORANDUM  
AND MOTION FOR DOWNWARD  
VARIANCE**

Sentencing Date: September 28, 2021

Time: 2:30 am

Court: Hon. Richard Seeborg

**I. INTRODUCTION**

Defendant Francisco Tomas Reus respectfully submits this Sentencing Memorandum and Motion for Downward Variance after pleading guilty to Count One of the Information, in violation of 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B), Attempt to Possess with Intent to Distribute 500 Grams of Cocaine. Mr. Reus agrees with U.S. Probation's (hereafter U.S.P.O.) guideline calculations of a Total Offense Level of 19 and a Criminal History Category of I, resulting in an advisory guideline range of 30 to 37 months. PSR ¶ 3.

Mr. Reus, however, disagrees with U.S.P.O.'s recommended sentence of 12 months and a day. PSR, Dkt. No. 34 at pg. 3. Mr. Reus asserts that his psychological and physical health issues, future surgeries and rehabilitation, and his son's serious injuries as a result of a recent head-on collision, justify a further downward variance. Under these circumstances, a sentence of

three days imprisonment to be followed by a five year term of supervised release conditioned upon service of 18 months of home confinement is “sufficient, but not greater than necessary,” to comply with the purposes of sentencing.

## **II. INDIVIDUAL BEFORE THE COURT**

### **a. Family Background**

Francisco Reus, 54 years old, is the oldest of two children born in San Francisco, California on August 10, 1967. PSR ¶ 56. At the age of eight, Mr. Reus and his family moved to Spain to be closer to his father’s relatives. Mr. Reus remained in Spain for approximately two years before moving back to the United States with his mother and siblings. The decision to leave Spain without his father was due to the fact that his father beat his younger brother, Estevan, multiple times. Many years passed before he ever saw his father again. PSR ¶ 57.

As a single parent, his mother tried her best to maintain a stable household and be there for her children. But as the sole breadwinner for the family, she was forced to work multiple jobs to ensure that her three children had a roof over their head and food on the table. Mr. Reus was often left to care for his younger siblings. Despite her best efforts, the family was evicted from apartments when she could not afford to pay rent. Many times the family lived with friends or family in the neighborhood for weeks or months allowing his mother time to get back on her feet. Mr. Reus’ grandparents eventually stepped in to help raise him and his two younger siblings so his mother could focus on providing for her family.

His grandparents lived in a rough neighborhood located in the Mission District of San Francisco which was overrun with drugs, crime, and violence. Mr. Reus walked with his two younger siblings whenever they left the house, including to and from school and guided them the best he could.

At the age of seventeen, Mr. Reus was forced to quit school since his mother needed him to help support the family. He found jobs around San Francisco to help put food on the table while also caring for his younger siblings. These jobs included working as a car detailer at local auto body shops, as a custodian at Luke’s Hospital, and as a security officer at the Shorenstein Company. With little to no supervision, Mr. Reus started hanging out the with wrong crowd and

1 experimenting with various drugs, including marijuana, cocaine, and PCP. He continued to use  
2 cocaine from the age of 18 until the instant offense. PSR ¶ 77. His struggle with addiction  
3 contributed to his three convictions from 1986 through 1997. He has never completed a drug  
4 rehabilitation program.

5 In 1989, Mr. Reus met his future wife, Karla Reus. They were married in 1992 and  
6 moved into a town house in Daily City with Mr. Reus' mother. PSR ¶ 63. It was there that the  
7 couple had their first child, Antoinette Reus, and six years later, Christian Reus. After growing  
8 up without a father in his life, Mr. Reus vowed to always be there for his two children and was  
9 determined to provide the best life he could for them. His letters of support are a testament to  
10 what a wonderful father he has been.

11 Always employed, he continued to search for better employment opportunities to support  
12 his family. In 1996, he began working for Lara Electric in San Francisco before leaving in 1999  
13 to work for Wesco Distribution. PSR ¶ 86.

14 Shortly after starting his new job, while visiting his mother's house in September of 1999,  
15 Mr. Reus was in the process of paying a pizza delivery man at the door when three men knocked  
16 Mr. Reus and the delivery man to the ground and forced their way inside the house. The men tied  
17 Mr. Reus and his sister up with a telephone cord and took everything they saw of value in the  
18 house. As Mr. Reus was struggling, one of the men grabbed a pair of scissors and stabbed Mr.  
19 Reus' several times. He was hospitalized for days and has a large scar on the right side of his  
20 stomach. This traumatic incident did not deter Mr. Reus from immediately going back to work to  
21 provide for his family, performing his regular warehouse duties.

22 In 2001, Mr. Reus left Wesco and began working at Consolidated Electrical Distribution  
23 in South San Francisco as a warehouse manager. PSR ¶ 85. He worked there for approximately  
24 a year before leaving and joining DHL as a driver. PSR ¶ 84. In 2002, he joined Teamsters  
25 Local 2785 as a forklift operator and was working as a Teamster when tragedy struck again. PSR  
26 ¶ 83.

27 In September 2019, Mr. Reus was involved in a serious work-related accident and  
28 suffered multiple severe injuries when a fully loaded 10,000 pound forklift, traveling at 10-12

1 miles per hour, hit him from behind while he was working at the Moscone Center. PSR ¶ 70.  
2 The impact threw him five to ten feet in the air. His left foot was run over by the forklift,  
3 fracturing his left toe and badly bruising his foot. His back was badly injured and required  
4 surgery to repair his ruptured discs on August 26, 2021. PSR ¶ 70. The forklift also ripped the  
5 skin off of his left leg.

6 After his injury, Mr. Reus could no longer work and his family relied on his disability  
7 checks each month as one of their primary sources of income. Out of work, in tremendous pain,  
8 and short on money, Mr. Reus made a decision that he will now regret for the rest of his life.

9 **b. The Offense**

10 In November 2020, the DEA launched an investigation “that targeted the drug trafficking  
11 activities of Jesus Ascencio Ramirez and his trafficking organization”, which led to the instant  
12 case before the Court. PSR ¶ 6. Specifically, this was a reverse buy operation.

13 During this reverse buy, Mr. Ramirez advised a confidential source that he was looking to  
14 purchase five “t-shirts” which the confidential source understood to mean 5 kg of cocaine. PSR ¶  
15 9. According to the confidential source, Mr. Ramirez agreed to pay \$33,000 per kilogram of  
16 cocaine. PSR ¶ 22. During the ensuing weeks, Mr. Ramirez had various conversations with  
17 undercover agents and, on one occasion, examined 1 kg of cocaine inside an undercover agents  
18 vehicle, which contained 10 kg of cocaine. PSR ¶ 11-23. Two days before his arrest, Mr. Reus,  
19 still dependent on cocaine, was offered the opportunity to purchase a kilogram of cocaine for well  
20 below its street value.

21 On December 2, 2020, undercover agents who were attempting to conduct the reverse buy  
22 encountered Mr. Reus for the first time. PSR ¶ 25. He was in tremendous pain, out of work,  
23 collecting worker’s compensation for a fraction of his salary and concerned about his future. Mr.  
24 Reus was prepared to buy 1 kg of cocaine from the undercover agent. The undercover agent  
25 declined to show Mr. Reus the cocaine when he requested to see it since Mr. Ramirez had  
26 previously sampled the cocaine. PSR ¶ 26. Mr. Ramirez instructed Mr. Reus to get the money to  
27 show to the agent. PSR ¶ 27. Mr. Reus returned with a bag containing \$40,990 and was  
28

1 immediately arrested. PSR ¶ 29. Although he did not resist arrest, his right meniscus was torn  
2 when he was tackled.

3 Mr. Reus was arraigned on December 4, 2020 where he was released on a \$50,000  
4 appearance bond to U.S. Pretrial Services supervision. PSR ¶ 4. While out on pretrial release,  
5 Mr. Reus complied with all Court ordered conditions, including clean drug tests. PSR ¶ 4.

6 On May 25, 2021, Mr. Reus pled guilty to Count One of the Information in violation of 21  
7 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B), Attempt to Possess with Intent to Distribute 500 Grams  
8 or More of Cocaine, pursuant to a written plea agreement.<sup>1</sup>

### 9 **III. SENTENCING GUIDELINES CALCULATION**

10 The parties agreed in a plea agreement to a Sentencing Guidelines calculation resulting in  
11 a Total Offense Level of 19, which is consistent with the calculations in the PSR. The parties  
12 agree that Mr. Reus is a Criminal History Category I. The advisory Guidelines range is 30 to 37  
13 months.

### 14 **IV. THE MOTION FOR DOWNWARD VARIANCE SHOULD BE GRANTED AND MR. REUS SENTENCED TO HOME CONFINEMENT.**

15 The application of the § 3553(a) factors in this case, show that the advisory guidelines  
16 sentence diverges from Congress' directive to "'impose a sentence sufficient, but not greater than  
17 necessary,' to accomplish the goals of sentencing." *Kimbrough v. United States*, 552 U.S. 85,  
18 101 (2007) (quoting 18 U.S.C. § 3553(a)). Consideration of the advisory guidelines range is  
19 subordinate to the mandate that the punishment be a particularized sentence *minimally sufficient*  
20 to accomplish the statutory purposes of sentencing. *See United States v. Carty*, 520 F.3d 987, 995  
21 (9th Cir. 2008) (en banc) (emphasis added). Here, the U.S.P.O calculated a guideline range of 30  
22 to 37 months but recommended a variance with a sentence of one year and a day. Mr. Reus  
23 contends that a greater downward variance is appropriate, and a sentence of three days  
24 imprisonment to be followed by a five year term of supervised release conditioned upon service  
25 of 18 months of home confinement would be sufficient to satisfy all the applicable goals under 18  
26 U.S.C. § 3553(a).

27  
28 <sup>1</sup> The written Plea Agreement was filed pursuant to Rules 11(c)(1)(A) and 11(c)(1)(B) of the Federal Rules of Criminal Procedure.

1                   **a. Mr. Reus's History and Characteristics**

2                   Mr. Reus recognizes the seriousness of his crime and is deeply remorseful. His  
3 acceptance of wrongdoing is strong and clear. PSR ¶ 33. Still, his criminal conduct must be  
4 considered in the context of his entire life, starting as a young child growing up without a father  
5 to his work-related injury, the recent losses of friends and family, and his son's horrific accident.

6                   The forklift accident left Mr. Reus crippled physically and emotionally. He had worked  
7 since he was seventeen years old and now was forced to stop working due to the severity of his  
8 injuries and rely on his disability check each month as the primary source of income. The stress  
9 of being the breadwinner for his family and not knowing how to pay for the growing bills was too  
10 much for him. His clouded thinking led him to make a decision which led to his arrest.

11                  Rather, than seeking professional help for the trauma and pressure he experienced during  
12 this time, Mr. Reus suppressed these emotions trying to be strong for his family. Emotionally,  
13 things have gotten worse with his arrest in this case and dealing with the deaths of his nephew,  
14 grandmother, and best friend.

15                  In February 2021, Mr. Reus' nephew died unexpectedly. The family initially believed his  
16 death was due to a seizure, however, they later learned it was from a drug overdose. The news of  
17 his death hit Mr. Reus and the family hard.

18                  A few weeks later, on the same day Mr. Reus was burying his nephew, he received a  
19 phone call informing him his grandmother passed away in Puerto Rico. As Mr. Reus continued  
20 to grieve the losses of his nephew and grandmother, his best friend, Mario Reyes, died. These  
21 losses tore a hole in Mr. Reus' heart that has not healed. He is finally receiving professional  
22 treatment at Dolan Mental Health to help confront the trauma and depression that is consuming  
23 his life. He speaks with a therapist once a week and states that the process has been "soothing to  
24 get things off my chest." PSR ¶ 73.

25                  Unbeknownst to Mr. Reus, tragedy was about to strike his life yet again. On September 4,  
26 2021, his son, Christian, was in a horrific car accident coming home from a bowling alley in  
27 South San Francisco. A Chevy suburban entered the freeway traveling in the wrong direction  
28 causing a head-on collision. Christian suffered two shattered femurs, damage to both hips, neck

1 injuries, blood clots, a fractured right foot, and facial lacerations. He has undergone multiple  
2 surgeries to repair his shattered femurs and multiple fractures of his right hip. Rods were inserted  
3 into each femur and he cannot put weight on either leg for five to six months while his bones  
4 heal. On September 15, 2021, Christian was released from the hospital and into his father's care.

5 Mr. Reus is now Christian's primary caregiver. He gives Christian injections twice a day  
6 to prevent blood clots in his legs, helps his son get dressed, bathe, eat, and go to the bathroom  
7 while also doing his own physical therapy. He is up with his son throughout the night.

8 Mr. Reus is constantly worried about who will care for his son if he is given a custodial  
9 sentence. While his wife, Karla, is helping after she finishes work, however, she is still struggling  
10 with alcoholism and is currently only six months sober. She had a near-death experience when  
11 the family was vacationing in Hawaii when she nearly drowned because of her alcohol misuse.  
12 The incident left her in a coma for a day. PSR ¶ 63. Mr. Reus cautions that it will be difficult for  
13 Karla to care for Christian on her own since she works and it will likely be six months to a year  
14 before he can start walking and being independent. Additionally, his son depends on him  
15 financially for his medications and surgeries.

16 Mr. Reus' criminal conduct must also be considered in the context of all the good he has  
17 accomplished in his life. He was forced to become one of the breadwinners for the family at the  
18 age of seventeen, holding only a middle school education. His friend Raul Elias describes Mr.  
19 Reus' by stating that he "is one of hard-working blue collar worker. He is always striving to  
20 better himself and it was that trait that I always admired." Attachment A – Letters of Support at  
21 15. His wife, Karla, tells the Court,

22 As long as [I've] known Francisco, he has always been a hardworking, caring,  
23 loyal person. As a father he always made sure our children were taken care of and  
24 never were in need. . . He was great support to my mother from the 1st time she  
25 went through her Cancer Treatment to the 2nd Treatment helping with  
26 transportation, bringing her food, spending time with her or any type of financial  
27 assistance. Six years ago my husband and I separated and during this time I  
28 suffered a tragic accident that left me in a coma in Hawaii. My husband dropped  
everything to be by my side and I was able to leave the Hospital by The Grace of  
God, he came back home and helped me recover back to health. This shows the  
type of man he is to his family, always there in time of need.



1 Attachment A – Letters of Support at 25.

2 Mr. Reus’ generosity and empathy for others is admired not only by his family and  
3 friends, but also the community at large. Fatima Ortiz, describes Mr. Reus as an “extremely  
4 generous and loving person. Sometimes a little too generous but that’s what makes him so unique  
5 and special to everyone he knows. He truly has a heart of Gold. Ask anyone who knows him, he  
6 goes above and beyond for his family and friends.” Attachment A – Letters of Support at 26.

7 Indeed, his neighbor, Barbara Harris, recalls when she was handicapped for a few years in  
8 2012, Mr. Reus “would come by and bring me coffee and a doughnut almost every morning until  
9 I was able to get back on my feet. All I can say about this young man is good things because he  
10 is a good person.” Attachment A – Letters of Support at 27.

11 For close to twenty years, Mr. Reus has played an active role as a baseball coach at Sacred  
12 Heart Cathedral Preparatory School in San Francisco. Steve Franceschi, stated:

13 Francisco worked for me at our Hall of Fame Baseball Academy, which is a  
14 baseball camp for 9-15 year old’s. I have run the camp for 35 years in the summer  
and we get upwards of 200 players each summer.

15 [Mr. Reus] is very generous with both his time and money and worked great in  
16 teaching the game to players. The players responded to his instruction and it was  
17 fun watching the young players hang around Francisco at our lunch table. They  
loved him. He would sometimes buy all the coaches’ lunch and of course he  
always had popsicles for the kids.

18 Attachment A – Letters of Support at 3. Mr. Reus is also a major advocate for low income youths  
19 to register and attend the camp with financial aid. His friend of over 40 years, James Elliott,  
20 recalls seeing Mr. Reus, “make change and an impact in the community and neighborhood he  
21 grew up in.” Mr. Reus has continually reached out to become involved with “kids in the  
22 neighborhood and [] community organizations were at risk youth needed [] extra moral support to  
23 stay positive, focused, and responsible. He has helped kids get into schools, play sports, and  
24 move forward to leave the negativity that effects our inner-city youth on a daily basis.”  
25 Attachment A – Letters of Support at 4.

26 Mr. Reus is also involved in The Mission Food Hub program and delivered over 70,000  
27 pounds of groceries to farm workers this past year. Roberto Hernandez, the CEO of Cultural y  
28 Arte Nativa de Las Americas (CANa) and creator of the Mission Food Hub, says that, “[d]uring



1 the COVID-19 pandemic [Mr. Reus] volunteered in November 2020 to deliver turkey groceries to  
 2 families . . . box[ed] and bag[ed] groceries and when needed has delivered [] groceries to families  
 3 who are in COVID quarantine.” Attachment A – Letters of Support at 16. This was during a  
 4 time when he was in tremendous pain and out of work.

5 Mr. Reus is not proud of his decisions and takes full responsibility for his actions in this  
 6 case. He also understands that his actions carry severe consequences and understands he will be  
 7 punished. He is sincere when he tells the Court:

8 I take full responsibility and have paid for it dearly with my life mentally and  
 9 physically. I am currently enrolled in therapy due to my mental state that’s been  
 10 eating me alive. I made the decision to try and make a little extra money and got  
 11 involved in a deal that almost took my freedom as [I] am currently fighting and  
 12 praying that this court have mercy on me. Covid-19 has been one of the worst  
 13 years with my injury, the death of my nephew, my mother-in-law fighting cancer,  
 14 and trying to make ends meet. Just not for myself but my kids. It took after 25  
 15 years for me to think I can take a shortcut when I know my heart that this wasn’t  
 16 my journey.

17 PSR ¶ 33.

#### 18 **b. Nature and Circumstances of the Offense**

19 Mr. Reus fully accepts responsibility for his involvement in the reverse buy, but asks this  
 20 Court to recognize certain aspects of the nature and circumstances surrounding his conduct that  
 21 warrants a downward variance.

22 Clearly, Mr. Reus committed the offense during a vulnerable period in his life. He had  
 23 been involved in a terrible accident and suffered severe and debilitating injuries in September of  
 24 2019. Five months later, as his medical bills accumulated and the global pandemic began, he  
 25 agreed to buy cocaine offered at four to six thousand dollars below the going street price. In his  
 26 letter to the Court, he states what influenced him to commit the underlying offense:

27 Lack of work due to me being injured meant less income when I have a lot of bills.  
 28 For 25 years I have been taking care of my kids and when I see myself struggling,  
 I felt less than a man and acted on, although that backfired and [now I] am living a  
 nightmare as I haven’t been the same. God only knows that [I] am scared and  
 have been crying myself to sleep.

PSR ¶ 33.

1 Mr. Reus is a drug user, who was offered a large quantity of drugs well below the value of  
2 the drugs at the time. His plan was to keep some for personal use and sell the remaining amount.  
3 He made the mistake of getting involved with Mr. Ramirez in a deal too good to be true. It is  
4 notable that since his arrest in this case, Mr. Reus has transformed his life and resisted the  
5 temptation to use drugs while he continues to be in a tremendous amount of pain. He submitted  
6 drug tests three times a month while out on Pretrial Release and has not submitted one positive  
7 drug test. PSR, Dkt. No. 34 at pg. 2.

8 **c. Just Punishment and Promoting Respect for the Law**

9 The Supreme Court has warned that “a sentence of imprisonment may work to promote  
10 not respect, but derision, of the law if the law is viewed as merely a means to dispense harsh  
11 punishment without taking into account the real conduct and circumstances involved in  
12 sentencing.” *Gall v. United States*, 552 U.S. 38, 54 (2007) (quotations omitted).

13 There is no doubt that the trafficking of cocaine is a crime requiring punishment. By  
14 pleading guilty, Mr. Reus will pay a heavy price for his mistakes. He will forever suffer the  
15 stigma of having a federal drug trafficking offense on his record along with the collateral  
16 challenges associated with it. His criminal record will make future employment challenging in  
17 most circumstances and impossible in others. Members of his community are aware of the  
18 offense and he continues to feel the shame of having engaged in the underlying offense conduct.

19 A sentence of three days imprisonment to be followed by a five year term of supervised  
20 release conditioned upon service of 18 months of home confinement together with a lifetime of  
21 collateral consequences represents a substantial penalty that adequately reflects the seriousness of  
22 the crime, will promote respect for the law, and provide just punishment.

23 Furthermore, Mr. Reus faces a long road to recovery. While he has undergone two  
24 surgeries this year (removal of his lymph nodes from his left leg in January 2021 and back  
25 surgery to clean out his ruptured discs in August 2021), there are plans for future surgeries to his  
26 left foot and right knee that have yet to be rescheduled due to the pandemic and his diabetes. He  
27 continues to be in considerable pain from his injuries and has to take pain medication daily. Mr.  
28 Reus also, unfortunately, contracted COVID-19 in May 2021, was sick for over ten days and lost

1 15 pounds. It is under these circumstances that the requested sentence meets the need for  
2 adequate punishment under the law. Life has already punished him severely.

3 The requested sentence is not unprecedented. In at least two prior cases, the Ninth Circuit  
4 has approved a sentence of one day imprisonment. In *United States v. Amezcua-Vasquez*, 567  
5 F.3d 1050 (9th Cir. 2009), the Court approved a sentence and one day imprisonment in a case  
6 where the defendant was facing a Guideline range of 41 to 51 months and in another, *United*  
7 *States v. Ruff*, 535 F.3d 999 (9th Cir. 2008), where the Guideline range was 30 to 37 months. In  
8 both cases, a period of community confinement was ordered as a condition of a term of  
9 Supervised Release.

10 Furthermore, the Supreme Court has cautioned that respect for the law is promoted in  
11 many ways, not always measured by the strictness of sentences or the nature of harsh sanction.  
12 See *Gall*, 552 U.S. at 599. The Ninth Circuit has reiterated this notion in *United States v.*  
13 *Edwards*, 595 F.3d 1004, 1016 (9th Cir. 2010), where the Court concluded that the "fact of a  
14 felony conviction," plus probation with appropriate conditions are measured sufficient, but not  
15 greater than necessary to achieve the objectives in 18 U.S.C. § 3553(a).

16 **d. The Need for Adequate Deterrence and Protection of the Public**

17 Mr. Reus' acceptance of responsibility and expression of deep remorse for his criminal  
18 activity along with his performance on supervised release and his success and willingness to  
19 abandon his addiction, indicate that he has the ability to change and become a productive and  
20 law-abiding citizen once again. He has the insight, skills, and commitment to avoid becoming  
21 involved in any criminal activity ever again. For these reasons, it is anticipated that the public  
22 will be adequately served and protected from further crimes of the defendant.

23 Indeed, the principle of general deterrence is based on the flawed premise that prison  
24 sentences deter crime. This faulty conception has resulted in the mass incarceration of  
25 individuals in the United States.

26 For the past 40 years, the United States has been engaged in a vast, costly social  
27 experiment. It has incarcerated a higher percentage of its people, and for a longer  
28 period, than any other democracy. In fact, with 5 percent of the world's  
population, the U.S. is home to 25 percent of its prisoners. There are five times as

1 many people incarcerated today than there were in 1970. . . [The] archipelago of  
2 prisons and jails costs more than \$80 billion annually — about equivalent to the  
budget of the federal Department of Education.

3 Dr. Oliver Roeder *et al.*, *What Caused the Crime Decline?* Brennan Center for Just., 22-23 (Feb.  
4 12, 2015). The condition of mass incarceration is especially troubling since there is no  
5 correlation between punishment and reductions in crime. *See id*; *see also* Gary Kleck and J.C.  
6 Barnes, *Deterrence and Macro-Level Perceptions of Punishment Risks: Is There a "Collective*  
7 *Wisdom"*? 59 Crime & Delinquency 1006, 1031-33 (2013). Kleck and Barnes' study concludes:

8 there is generally no significant association between perceptions of punishment  
9 levels and the actual levels of punishment that the criminal justice system  
10 achieves. This in turn implies that increases in punishment levels do not routinely  
11 reduce crime through general deterrence mechanisms, because the fundamental  
link between actual punishment levels and perceptions of punishment levels  
appears to be weak to nonexistent.

12 *Id.* at 1031.

13 Mr. Reus understands that his conduct has had a significant impact on his family and is  
14 determined to never put them through something like this ever again. His family and friends are  
15 also aware of his underlying conduct in this case and will make sure Mr. Reus remains a law  
16 abiding citizen. His friend Raul Elias tells the Court:

17 I have personally spoken to Francisco we have shed tears together and I know how  
18 incredibly remorseful he is regarding the unfortunate situation he has placed  
19 himself in. I would be the first to humbly say, Francisco is not a threat to society  
and if he is given the opportunity to show the courts his remorse, he will step up to  
the plate.

20 Attachment A – Letters of Support at 15.

21 Mr. Reus' efforts while out on pretrial release and both his and his son's long road to  
22 recovery demonstrate that there is no need to impose a custodial sentence to achieve deterrence  
23 and protect the public. Given the ongoing global pandemic, the protection of the public is best  
24 served by being selective regarding who is sent to prison.

## 25 **V. CONCLUSION**

26 For the foregoing reasons, Mr. Reus respectfully requests that this Court grant his motion  
27 for a downward variance and sentence him to three days imprisonment followed by a five year  
28 term of supervised release conditioned upon service of 18 months of home confinement.

1 DATED: September 21, 2021

Respectfully Submitted,

2 /s/

3 JOHN M. RUNFOLA

4 Attorney for Francisco Tomas Reus

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

## **ATTACHMENT A**

Daisy Lucas  
SFMTA Enforcement Division  
505 7<sup>th</sup> Street  
San Francisco, CA 94103

September 1, 2021

Dear Honorable Judge,

My name is Daisy Lucas and I am the Assistant Director for the SFMTA Enforcement Division. I am proud to offer my recommendation of Francisco Reus to whom I have personally known for about 25 years as a friend who grew more like family.

During my relationship with Francisco Reus, I have experienced an individual who shows up earlier than asked, works hard, and carries himself in a polite, respectable manner. In addition, Francisco is a family person who has always presented himself with levelheadedness and grace. He is dependable and is always there when someone in the family is in need or to cheer them on. My children call him uncle and always know he will be there for them when called. I have seen such a change in Francisco during the past 10 years. He is a loyal person with a big, generous heart. I know he is remorseful for his past bad decisions but has shown to all of my family what genuine kind hearted person he is.

It's with great confidence that I recommend Francisco Reus as someone, I truly believe, possesses the character and judgement for the betterment of our community.

Please do not hesitate to contact me if you should require any further information.

Sincerely,

*Daisy Lucas*

Daisy Lucas  
415-310-1445



Dear Honorable Judge,

My name is Steve Franceschi and I am a teacher and baseball coach at Sacred Heart Cathedral Prep in San Francisco California. I have been at the school for over 40 years and I have known Francisco Reus for 15 years or so when his son Christian played for us here at school. Francisco worked for me at our Hall Of Fame Baseball Academy, which is a baseball camp for 9 - 15 year olds. I have run the camp for 35 years in the summer and we get upwards of 200 players each summer. Francisco helps me market our camp each year and has worked here for maybe 5 years. He interacted with kids every day for 4 weeks and he also provided us with low income kids who we could help attend our camps.

I think Francisco did a great job for us. He is soft spoken, diligent, hardworking and sensitive to other people's needs. I would say Francisco is one of the most trustworthy and honest people I have ever worked with. He is very generous with both his time and money and worked great in teaching the game to players. The players responded to his instruction and it was fun watching the young players hang around Francisco at our lunch table. They loved him. He would sometimes buy all the coaches' lunch and of course he always had popsicles for the kids.

I know Frank had some problems in the past but I believe he is remorseful and in my estimation has been a very positive person to everyone.

It was an honor to be asked to write a letter of support for Francisco Reus. I've always known him as an outstanding individual willing to help out in any way he can. I hope I have painted a favorable picture of support because he deserves it.

Sincerely,

A handwritten signature in blue ink that reads "Steve Franceschi". The signature is fluid and cursive, with a small circle at the end of the last name.

Steve Franceschi  
Sacred Heart Cathedral Prep  
1055 Ellis Street  
San Francisco, Ca. 94109

September 4, 2021

Dear Honorable Judge,

My name is James Elliott, I have been gainfully employed with the City and County of San Francisco and a Civil Servant for over 25 plus years and am writing to you on behalf of a dear friend Francisco Reus who I have known for over 40 years.

I have known Francisco from growing up here in San Francisco, I have known him from our early teenage years, went to high school together, and growing up and becoming men, and fathers and have kept in contact all of these years. I know growing up in the inner-city has its ups and downs but over the years of staying in contact I have seen Francisco overcome obstacles and hardships, make change and an impact in the community and neighborhood he grew up in. I had watched him make change, help others, and show strong loyal commitment and involvement in the kids. Francisco reached out to being involved not only in his own kids and their friends lives but also kids in the neighborhood and got involved in community organizations where at risk youth needed that extra moral support to stay positive, focused, and responsible. He has helped kids get into schools, play sports, and move forward to leave the negativity that affects our inner-city youth on a daily basis.

I would like to add that I know of one kid he has helped make a strong impact on and this is my child. My son has a strong base at home but listening to Francisco always telling him listen to your mother and father as some of us did not have a solid family as a kid, stay in school, look at so and so you can do the same as they did and attend college or a university and do more with your life. My son listens to the stories and experiences that affect all kids and has been thankful for Francisco helping him attend sports camps, introducing him to coaches at prestige's high schools and has thru this made my kid understand that what I am telling him is fact. Thru all of this my son is applying to one of San Francisco's most prestige's high schools for class of 2022/2023 for freshman year.

Honorable Judge, when looking at and listening to Francisco I can see he is truly remorseful, and ashamed of himself. He now looks and feels hypocritical to the very same community he tried to help lift up. I truly believe this negative situation will bring a positive solution and experience for him to share. Francisco's situation shows the downfalls of pressure from your peers, how they can influence you. I see him reaching out and going to the very same community and organizations he helped, he is now asking for forgiveness, help, and support from them. This is due to the shameful, embarrassing situation he has put himself in.

I like to conclude that I am a lifelong friend, I look past his situation and participation in what he has done rather innocent or guilty. I am not here to judge him. I am here as a friend showing support. I hope that the outcome will make for a positive in his life.

Sincerely,

James Elliott

Monica M Gonzalez  
33 8<sup>th</sup> Street, #1202  
San Francisco, CA 94103  
415.424.5165

Dear Honorable Judge,

My name is Monica Gonzalez and I grew up with Francisco Reus since junior high school in San Francisco. We have always supported each other since that time. We grew up in the Mission District and worked hard to be good people and great parents. We have struggled to make ends meet, as most people at this time, but we always focus on our children, future and to be successful. I am a Real Estate Agent and searching for a new opportunity to which I believe will be coming very soon. I am wishing to assist Francisco as he is a great cook and is searching for the opportunity to open his own restaurant.

Francisco has been very supportive to me and my family always, especially when my son was murdered in 2008 (Angelo Zuniga). He has beautiful children who rely on their father as he is the rock that holds the family together and he is their support system, and he is always there to make sure that they are secure and always safe, and well loved.

He is a great friend to my family and myself. He also helps the community with donations, food and reaches out to the homeless and others that need help.

Should you require additional information, please do not hesitate to call me at 415.424.5165.

Sincerely,

Monica Gonzalez  
415.424.5165

Dear Honorable Judge,

My name is Joanna Dabis and happy to offer my recommendation of Francisco Reus, whom I have personally known for about 8 years of my life as a family friend.

During the time I have known Francisco, he has been a great father and provider to his family, a reliable family friend. He has helped my nieces get into summer camps at Sacred Heart Cathedral Preparatory in San Francisco throughout their childhood. He even coached them one year during baseball camp. He has also been a great support system through my grief process since I lost my mother in May of this year.

Aside from making mistakes from time to time, he is respectable, responsible and takes accountability when necessary.

Please feel free to contact me at 415.706.4320 should you require any further information.

Respectfully,  
Joanna Dabis

September 1, 2021

Regarding: Francisco Reus

Dear Honorable Judge,

My name is Jose Quezada Jr. I am a Bay Area native born and raised in San Francisco/Daly City. I am a coffee, sugar and import goods third-party surveyor. I have been with my company, Garrigues Company, for 25 years. I have known and been friends with Francisco Reus for over 20 years.

Though out the years I have seen Francisco give back to his community by volunteering and working in sports programs for children in the Catholic schools system. He has always worked hard to support his family. Francisco has great work ethic by being loyal and dedicated. He is a kind, peaceful and a nonviolent person. After his forklift accident at work, Francisco has tried his best to recover so that he could get back to work as soon as possible.

I am sure that Francisco has learn from any mistakes he may have made. I believe that as soon as possible he will continue to give back to the community and be a positive role model to anyone he encounters.

I am very supportive of Francisco and I look forward to continuing a long productive friendship with him.

Sincerely,

*Jose Quezada, Jr.*

Jose Quezada, Jr.

415-244-3040

732 Washington Street

Daly City, CA 94015



August 30, 2021

From: Imani Stewart  
President, Sport Tech Inc./DC Stars Football (Youth Football League)

RE: Character reference for Francisco Reus

To, The Honorable Judge:

My name is Imani Stewart and I am the President for my football program, Sport Tech Inc. – DC Stars Football. I was recently honored on August 14<sup>th</sup>, 2021, with my own day in San Mateo County for the high-level service and for inspiring others in our community for the past 20 years.

I am writing this letter for my very good friend, Francisco Reus. Francisco is a great person with good moral character. I have known Francisco for over 10 years and he has always been kind and generous with others. He prides himself in being family oriented, which is admirable and inspiring.

Francisco has made a positive impact and is also very involved in the community. I personally know that he has helped many high school applicants that could not get into Junipero Serra High School get into Sacred Heart Cathedral Preparatory. He volunteers for a number of sports programs in the Bay Area including the Sacred Heart Preparatory Baseball team. Francisco has been volunteering for my program for over five years. He is very involved in every aspect of the organization from coaching, being a field volunteer during games, and participating in various organization events. He is very responsible and wants to do the best in his work. There has not been a single incident where there has been a complaint against him.

I am aware of Francisco's current circumstances and know that this is highly out of character. He has owned up to his errors and I firmly believe that he has learned from this situation and is working to be on the right path. I hope you will take into consideration what an outstanding person Francisco has become when making your decision.

If you have any questions or need additional information, please do not hesitate to reach me at (650) 784-5568.

Thank you for your consideration.

Sincerely,

*Imani Stewart*

Imani Stewart

Dear Honorable Judge,

My name is Isabel Reus the sister of Francisco Reus I am an Account Manager for Admiral Security and have worked there for the past 10years. I have had my up and downs in life but by the grace of GOD I have been clean for about 20years.

My brother has been the rock of our family and the dad I never had. Since young my brother has worked a lot of odd job just to make sure ends meet rent was paid and food was placed on the table as he showed me the values of what a true man is and has installed that vision in me till this day. While growing up my brother was very overprotective and took me to school and pick me up but as rebellious as I was, I ended up getting pregnant at a young age but not once did he look down at me but instead reassured me that I had nothing to worry about and that he would be there for me as I completed school and graduated from Mills High School.

I love my brother for the man he has become. This mistake doesn't define him as a person as he has done good by so many especially our youths and embedding in them to strive and become somebody and not let there struggles within there families keep them from reaching their dreams, as he helped them get financial aid and raised money for uniforms transportation food as well as traveling expenses.

These past two years have been a roller coaster for Francisco from being on top of the world to the. He has been diagnosed with diabetes got hurt on the job taking away his source of income which had him overthinking on how he was going to continue paying his car notes rent helping my mom so that she continues living comfortably and most importantly taking care of his own family. Then when COVID hit and the world came to a halt and all the extra time he had on his hands got him to a place where he thought that going back to his old ways would help him make some extra cash but instead, he's here fighting for his freedom. And through this journey he has only had a dark cloud over his head as he has had to bury two of his best friends who where his support system and my son who originally, I thought died of a seizure to knowing it was a drug overdose has crushed him and finally our step grandmother. And if that wasn't enough, he's going through a lot of medical issues as we even had to quarantine as a family due to him bringing home COVID.

Your honor with all these support letters you've received on behalf of my brother I beg you to have mercy on him as he's not this horrible picture that has been painted of him but a caring loving father son and brother. I need him as much as he needs us. My family who relies on him for financial emotional and physical support.

Thank you  
Isabel Reus



Eddie Alberto Alvarado  
2 El Campo Drive  
South San Francisco, CA 94080

September 09, 2021

In regards to: Francisco Ruis

Dear Honorable Judge,

My name is Eddie Alvarado, I am 58 years old and have been a Storekeeper for Kaiser Permanente Hospital for the past 28 years. My wife is a 23 year veteran of the San Francisco Police Department. I have a 28 year old son, who graduated from USF and is currently attending Samuel Merritt University's Physician Assistant program. I also have a set of twin girls who will be turning 13 in October.

I would like to begin by stating that Francisco and I have been friends for over 35 years. During our 35 years of friendship, I have always known him to be a caring, responsible and generous individual. He is always ready to assist in time of need. When I was unable to sign my twin girls up for the Sacred Heart's Catholic School Sports program, Francisco stepped in and assisted me with getting them into the program. This was huge for my daughters, because being in the sports program, will assist them when applying for high school next year.

I admire Francisco, because he has a profound commitment to helping others. Francisco has been involved in assisting in various programs, such as feeding the farm workers in Bakersfield, Fresno and Delano. Donating to the backpack giveaway, for kids in need. Cooking for over 350 homeless individuals in the Mission District. He is currently involved in charity work for the Mission Food Hub, which serves the community by procuring and distributing culturally appropriate and nutritious food for families in the Mission District. He has even recruited my wife in volunteering to deliver food for the Mission Food Hub.

I would like to end by thanking you, for taking the time to consider my letter. I truly believe that if given the chance, Francisco will continue to be a solid figure in this community. He has taken responsibility for his actions and has expressed sincere remorse. I will support Francisco, no matter the outcome. My hope is that this letter will act as a positive and contributing factor when considering his case.

Kind regards,

  
Eddie Alvarado

Raul Diaz  
678B Railroad Avenue  
South San Francisco, CA 94080  
415.672.4964  
[raul\\_diaz@me.com](mailto:raul_diaz@me.com)

Date: Saturday, August 28, 2021  
To: Honorable Judge  
RE: Francisco Reus

I am writing on behalf of Francisco Reus. He's a very close friend that I've known for over 20 years. I've been fortunate to have attended higher education. Employed in the technology industry for many years in various management positions and am currently a General Manager at a commercial and residential construction company. I've also had the opportunity to have travelled quite a bit. I believe these experiences give you a good perspective on people and human behavior in general. I find it gratifying that among the many people I've come across, I count Francisco as one of the better human beings that I know. He's an empathetic, generous and kind man. His contributions back to the community are notable. He recently travelled to Central California to provide food and comfort materials to immigrant farm workers. He also has a long history of being a volunteer with high school sports programs. I suppose that the biggest challenge that one could confront in life is that of being a parent. If that's the highest measure which we will be judged, then he's done a great job. His children will be great people as a direct result of how he's handled parenthood.

I understand that as human beings we often make mistakes. Both great and small. But I believe it would be a great disservice to those who know him to define Francisco by the mistakes he's made. To say he's learned and is remorseful is an understatement. He's an asset to his family, his friends and has so much more to contribute. I hope you find it in your judgement to grant him leniency while considering his case.

Sincerely,

*Raúl Díaz*

Raúl Díaz

**DAN'S DRILLING & FENCING INC**  
**POST HOLES JEEP AUGERED**  
**CHAIN LINK FENCE SPECIALIST**

209 ARROYO DRIVE SOUTH SAN FRANCISCO CA 94080  
#360768

Dear Honorable Judge,

My name is Dan Ordonez I am a small business owner in South San Francisco Ca. (Dan's Drilling & Fencing Inc.) I'm also a father of four and grandfather to five I've been married for 35 years and have raised my family here in South San Francisco where I have resided for the last 35 years, I also am a member of Westside Baptist Church where I have attended for the last 20 years. I've coached Little League Baseball here in South San Francisco for the past 35 years.

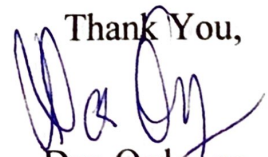
I'm writing this letter in regards to my good friend and fellow coach Frank Reus who I have known for 40 years and have coached with from 2004 to 2014. In those 40 years I can not recall Frank losing his temper or acting in any inappropriate manner. Frank has always carried himself with humility and graciousness towards the players and parents. Frank has always been a tremendous asset on the ball field but more importantly he was a good role model to the young players.

On many occasions Frank brought new baseball jerseys and baseball pants to players who's uniforms were torn or ripped which he purchased with his own money. Frank would provide rides to and from games to kids who didn't have transportation. After EVERY game Frank would take the team out for dinner at one of his favorite spots (ToTos Pizza/Don Picos/or McDonalds) all the players loved Frank.

When I talk to the kids I coached in the past they all ask me about Frank and tell me about the great times they had with Frank while on the team. I'm looking forward to coaching my grandsons with Frank by my side.

I know since the fork lift accident Frank and his family have been struggling and I hope he can get through this devastating time, never the less I will stand and support Frank in any situation because I've seen him in action and I know his character. Please feel free to contact me with any questions regarding this letter.

Thank You,



Dan Ordonez  
650.296.0409

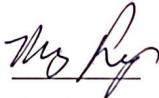
Margarita Ruiz  
September 13, 2021  
RE: Francisco Tomas Reus Sr.

Dear Honorable Judge:

My name is Margarita Ruiz, I am currently employed at Kaiser Permanente as a nurse for 24 years; I am a close family friend of Francisco. I have known him for 25+ years. We have been very close friends for 23 of the 25 years I have know he and his family.

Francisco has always been a very kind-hearted person. He is fun loving and very generous. He is always willing to help friends and family. He will "give the shirt off his back" to help others in need. He has a very infectious personality, people love being in his company because he is such a fun and positive person. For example, during the summer he volunteers his time at Sacred Heart Cathedral to aid under privileged kids with scholarships for sports programs. He engages with kids' families to understand their needs and acts as a liaison with the church to aid the children. May 2021, he volunteered his time during the pandemic to deliver 70,000 lbs of groceries to farm workers located in Bakersfield, Fresno and Delano Ca. In addition, during the pandemic, he collaborated with friends and collected donations from the community and cooked warm meals for 350+ homeless individuals in the Mission District of San Francisco. He volunteers 3 days per week at the Mission Food Hub to provide food and groceries to those in need. These are just a few examples of the many ways Francisco spends his time supporting the local community. Francisco is committed and dedicated to the workforce. He has been a member of the Teamsters Union for the last 19 years, where he has served as a forklift driver. Unfortunately, he was struck by a forklift (while at work) in September of 2019. Since then he has been on disability. But as you can see from the examples, he has spent his free time helping other in the community. Francisco unfortunately made an error in judgement. He realizes that his mistake has affected his family, friends, and local community. He is very remorseful and wishes he could turn back the hands of time. Learning from mistakes and moving forward in a positive fashion is his total focus. Maintaining a strong relationship with his wife of 29 years and two children (Christian and Antonette) is his primary focus.

The bond that we have developed over the last 25 years assures me that he has learned from his mistakes and will move forward in a positive fashion and continue to be a productive citizen. I completely support him as I know what type of person he is. As stated earlier, he is very positive, fun loving and caring. This one mistake does not and should not define him as a person. He is a dedicated father, provider for his family, leader in the community and overall great person.

A handwritten signature in black ink, appearing to read 'Margarita Ruiz', written over a horizontal line.

Margarita Ruiz

08/24/2021

Dear Honorable Judge,

My name is Kameisha James and I am writing this letter on behalf of Francisco Reus whom I known for over 30 years. Mr. Reus is a longtime neighbor who became more like family.

During my years of knowing Mr. Reus, he has displayed nothing but great morals and characteristics. He works hard and carry himself in a polite and respectable manner. He is a stand up father to his children, never missed their sport games, volunteered as a coach and showed up and participated in every school meeting and event. He never missed a beat when it came to his children. He's also a dedicated husband to his wife and always extending a helping hand to his family and community members. I can always call on Mr. Reus if my disabled mother or I need assistance or guidance. He has always put others before his needs and also presents himself with a level head and claim demeanor.

I can go on and on about how remarkable of a human being Mr. Reus is. To know him is to love him. I stand with and beside him because he is a man that exhibits courtesy, dedication, temperance and compassion to his family, friends and his community on a daily basis.

Thank you for your time and attention. Please don't hesitate to contact me for further information.

Warmest Regards,

*Kameisha James*  
**Workforce Development Supervisor**  
**415-756-1774**



**Raul Eric Elias**  
**80 Schwerin St.**  
**San Francisco, CA 94134**  
**(415) 309-8057**

Dear Honorable Judge,

My name is Raul Elias, and I was born and raised in San Francisco, CA. I am a veteran of the U.S. Army and I am presently a law enforcement officer in the City and County of San Francisco. I've had the honor of the serving the citizens of San Francisco for over nineteen years. I first meet Francisco in the summer of 1987. I clearly remember the era because I graduated from Riordan High School in June of 1987. Francisco vibrant personality and enthusiastic energy made it easy to quickly become friends. I have the pleasure of meeting Francisco's children and their mother. Francisco is a wonderful father and I have watched him raise his children into amazing young adult.

Francisco character in my humble opinion is one of a hard-working blue-collar worker. He is always striving to better himself and it was that trait that I always admired. Francisco is a great baseball player, he played sports not only as a hobby, but he always gave back to the community. My son is presently twenty-two years old and is attending the University of San Francisco. I was blessed to have a son who was athletic, specifically a baseball player, his entire youth all the way to the college level. I bring this up because if it wasn't for Francisco my son wouldn't have been half the player he is today. Francisco recognizing my son's athletic ability. Francisco pushed me to enroll him many baseball camps in his youth and he always made an effort to train with him in order to better his talents. I believe it was the summer of 2012, Francisco was actively involved in the Sacred Heart Cathedral High School summer baseball camp. Francisco pushed me to enroll my son but with work and the distance from our home to the camp it was quite difficult for my wife and I to drop off and pick up my son. Although Francisco was also working, he made an effort to help us and pick up my son somedays to lend a helping hand. That's the type of man Francisco is and will always be.

When my wife and I were married by way of the church we were drawing out the list of invited family and friends. As you can imagine your Honor Francisco was at the top of the list. It was an amazing day, and I was glad Francisco was there for us, it was our way of saying thank you to him. Sir we all hit bumps in the road throughout our lifetimes and know I have. I have personally spoken to Francisco we have shed tears together and I know how incredibly remorseful he is regarding the unfortunate situation he has placed himself in. I would be the first to humbly say, Francisco is not a threat to society and if he is given the opportunity to show the courts his remorse, he will step up to the plate.

Thank you, your Honor respectfully submitted.





August 24, 2021

Dear Honorable Judge,

I serve as the CEO of Cultural y Arte Nativa de Las Americas (CANANA), a non-profit community based organization based in San Francisco. Our organization partners with the San Francisco Unified School District providing teachers in the schools to teach student cultural history, music, and dance. Students then participate in the annual Carnaval San Francisco Grand Parade and Festival which we have held for 41 years.

CANANA during the COVID 19 pandemic crisis started the Mission Food Hub providing over 9,000 families with groceries weekly. At the hub we also have been providing COVID testing, vaccine, and services families have requested which include learning hub for girls, clothing, internet, laptops, jobs, rental assistance, books, backpacks, and health services.

I have known Mr. Francisco Reus for over 30 years and appreciate that I have always been able to rely on him throughout all these years to volunteer on various projects with full trust and confidence. During the COVID 19 pandemic he volunteered in November 2020 to deliver turkey groceries to families and since then he has volunteered to box & bag groceries and when needed he has delivered to groceries to families who are in COVID quarantine.

I did notice a difference and change in Mr. Reus after his forklift accident. I often check in on him and it was until recently that he admitted it caused him a lot of pain and he is getting an operation. He shared he made a few mistakes and is remorseful. I have supported him throughout his recovery and will continue to despite his mistake and as I shared it's a learning moment in life.

Should you need anymore information, please feel free to contact me at 415.206.0577.

Sincerely,

*Roberto Y. Hernandez*

Roberto Y. Hernandez

CEO

**Rita Marquez  
1020 E. Meadow Ave.  
Pinole, CA 94564|  
Telephone: 415.305.3513**

August 28, 2021

Dear Honorable Judge:

My name is Rita Marquez I am currently employed at California Pacific Medical Center, Emergency Room, for over 23 years.

I have been friends with Francisco Reus for 38 years on a very personal level as I am one of this close friends. Ever since we were young kids, he has been a very loving, giving person with one of the biggest hearts that I know. He has been an incredible emotional support to my family. He has provided food and medical supplies when needed.

In addition to our friendship, Francisco is an outstanding father and an upstanding member of our community, he has organized and volunteered at many events providing food and school supplies for those in need. He currently volunteers at Mission Food Hub, and in May 2021, he traveled to Fresno and Bakersfield delivering 70,000 lbs. of groceries to farmworkers. He also volunteers at Sacred Heart High School helping students obtain scholarships for baseball camps. His work for the community and those in need primarily children does not go unnoticed.

It is unfortunate that Francisco is in this situation but, as we move forward, I believe that he will emerge a better person as I still believe Francisco Reus to be an honorable individual, a valuable member of our community and a good human being.

Respectfully Submitted,

Rita Marquez

415.305.3513

Ana Roblero  
1319 Rosita Road  
Pacifica, Ca, 94044

Dear Honorable Judge

My name is Ana Roblero I am a Paraprofessional with SFUSD for 12 years in the city of San Francisco. I have known Francisco Reus for 12 years. He has become a dear friend of mine and a mentor to my three children.

Ever since I met Francisco Reus I have had the opportunity to witness his persona in many different settings, personally and professionally. I am honored to mention that he is a genuine good friend. He is the most caring person. He is resourceful and generous. He is the most dedicated, loving, supportive, responsible and present father to his children. He is well known and respected in the community. His work ethics are impeccable. Even with his unfortunate circumstances in his health and injury at work. He continues to persevere. Although I have noticed he's lost a significant amount of weight. In which he's made great strides in eating healthier and has not let his pain, discomfort, and persistent cough get the best of him.

The most recent and significant experience I've had which involved Francisco Reus was in how he mentored me and my youngest daughter for the last three years in preparing her for High School. I am so thankful to Francisco because I was able to apply to extra curricular activities in volleyball at Sacred Heart Cathedral Prep in San Francisco. He helped me by updating me on special deadlines and throughout the whole process in applying for High School. All while he has been dealing with his own health, private life, volunteering, parenting and other responsibilities. I am proud to say my daughter is an incoming freshman at SHCP this school year. I have an alumni at SHCP from the class of 2019 in which Francisco was a part of as well. He showed his support by continuously checking up on him, and made sure he stayed on the right path by attending his football games throughout all four years. I truly believe that he is well experienced in his parenting skills. I trust him tremendously and I know I can count on him.

I believe that Francisco has definitely learned from his mistakes. He is very remorseful. He knows he can only get through all this by upholding himself accountable. His family, friends and community are the center of his focus.

Also, I lost my car a year ago due to a hit & run. Although Francisco has been preoccupied with his own responsibilities. He accompanied me to the dealership. He made sure I was given the best outcome possible considering I'm a single mom with no experience in purchasing a new vehicle. We're so fortunate to have him in our lives. I hope that I can help in writing this letter. As it would be a small token of my appreciation in comparison to the outstanding friend he is to me and my three children.


Respectfully, Ana Roblero

Raymond Ortiz  
67 Burlwood Drive  
San Francisco, CA 94127  
(415) 632-0728 mobile

Dear Honorable Judge,

My name is Raymond Ortiz, and I've run a baseball academy in San Francisco for the past 20 years. I've been a close friend to Francisco Reus for 30 years. I also worked with him for over 10 years.

Francisco has always been someone who can be counted on to take care of those in need. We worked together for 10 years at Sacred Heart Cathedral Baseball Academy. During this time, I personally witnessed his care, compassion, and generosity toward his community. He's spent countless hours fundraising for the SHC Athletic Program. Always giving his time with a smile. Throughout the time I've known him, he can always be counted on to volunteer a hand when there is a need. A great example of his compassion is that he currently helps at the Food Bank, even though he's moving with pain from his Forklift accident. Although I am not biologically related to Francisco, I am proud to call him family.

  
Raymond Ortiz



Dear Honorable Judge.

Salutation's peace, and respect.

Hello. My name is Rafael A. Losno Jr. I am writing this letter of support on behalf of Mr. Francisco Reus. It is with the utmost pleasure, that I am given this opportunity to write and share what it means to witness unity, togetherness, and giving back to the community through love, and redemptional work. I hope and pray that after you finish reading this letter, you'll find it in your heart to allow Mr. Francisco Reus to continue his work and leadership in the community.

I work for S.F., S.V.I.P., the acronym stands for San Francisco Street Violence Intervention Program. A Mayor's program and under the watchful eye of senior advisor, of director of violence prevention services of San Francisco California. In current position with this organization, and in this position, it allows me to work and navigate throughout the city and county. I participate in outreach, intensive mentorship and build relationships with our communities. I am also a CRISIS/SHADOWS responder within our program. I also have the responsibility to respond to some situations, where unfortunately the value of life is inevitable.

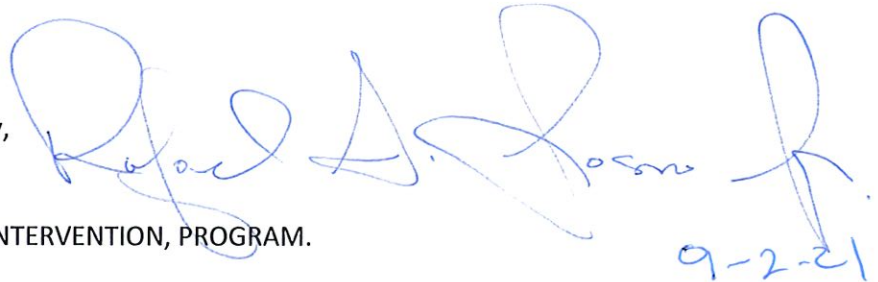
As a seasoned professional with over a decade of experience working in the urban and inner-city areas of our communities, it gives me great hope, that morals, ethics, and genuine innate goodness still matters, and it does still exist in people. As you know. We are living in an, forever changing world. Everyday there seems to be yet another crisis and at times, it leaves many, shaking their heads in total disbelief. Well. I for one still believe, and still have hope that every single human being has a lot to offer if he or she, wants to. It is here where I have witnessed Francisco reveal his true nature of goodness for his fellow man. I have been assigned to observe and assist with the thousands of people who rush and congregate every Monday, Wednesday, and Friday at the MISSION FOOD HUB located on 19<sup>th</sup> and Alabama street to receive and pick up boxes of food and other assistance for their families right in the middle the mission/district 9/ and our zone 2, in supporting the local families who are struggling with this foreign and silent enemy. COVID 19.

The local community has lost many, to this invader. Yet in this darkness there is still this bright beacon of hope and light. It is in this capacity that I have observed and witnessed Francisco demonstrate his golden skills as a person who cares and is willing to carry his fellow man in these times of crisis. I have seen him pick up thousands of boxes of food. Not only pick up, but also deliver. I have seen him also organize and lead the department where he has been working with. As I have already mentioned. I am a crisis responder here in the City and County of San Francisco California. Watching and observing Francisco work and mobilize through the chaos lets me know, that there is still is goodness and softness in people who are willing to go the extra mile. I have also witnessed Francisco having one on one

conversation with some of our youth who are living their life on the edge. They listen intensely to every word. It is very hard to at times just to get youth to gather and listen to wisdom. I too, have sat in on those gatherings because it allows me to also share with our youth on how important and how vital their presence and participation is needed with community effort. And guess what?. We now also see some of our youth coming around participating with mission food hub. This is priceless. Makes my job there less stressful to know someone has my back in the work.

There is no way to ignore the fact the effort, the motivation, the energy, and carrying without also seeing redemptional work. I can see Francisco taking accountability and not allowing ego or pride to slow down his great strides in giving back. Everyone has a testimony. And I mean everyone. However, explaining the journey is different. Redemption is defined differently to many people. I for one also know its definition. "returning back to those times and places and making things right". However, I also believe vengeance, is the true art and sacrifice into saving others in the face of a tough situation. Francisco is a life changer. I strongly believe that Francisco has had a deep conversation with him and has acknowledged his errors. He must continue to lead by example in our community. I promise to remain here in our local mission district. I will continue to support our local neighborhood, zone 2/district 9/ in the mission, and I will proudly embrace Francisco to assist me in making a change in our San Francisco community.

With Respect and dignity. Sincerely,



San Francisco STREET, VIOLENCE, INTERVENTION, PROGRAM.  
(S.V.I.P.)

Rafael A. Losno JR.

CRISIS RESPONDER/SHADOWS  
TEAM MEMBER.

150 Executive Park, Suite 1180  
San Francisco, Ca 94134  
415-470-1729

Elizabeth Vazquez  
Tio Chilo's Grill LLC  
2872 24th Street  
San Francisco CA 94110

September 1, 2021

Dear Honorable Judge

My name is Elizabeth Vazquez. I am 38 years old. I am the owner of Tio Chilo's Grill LLC a restaurant located in the heart of the Mission in San Francisco.

I have known Francisco Tomas Reus as a good friend and loyal customer to my restaurant. For over 15 years. The first time I met Francisco I thought to myself this guy is too quiet and serious. As time passed boy was I wrong.

Francisco is true to character. He is hard working a man who is ambitious, dedicated to his family and helping others, he is a great friend.

Francisco is always willing to help others, not expecting anything back in return. That's just the kind of person he is. This speaks to the great, caring human being he is. He will lend a hand to anyone without hesitation and will do it with pleasure. For example, I recall a time when it was rush hour at the restaurant. Not expecting him to walk in, he quickly put his stuff down and started helping with whatever he could in whatever capacity he could. He didn't ask if I needed help nor did he ask for any sort of compensation. In fact he stayed until he made sure I was ok and everything was running smooth in a timely manner once again.

It is my sincere hope the court takes this letter into consideration despite the current case. I still believe Francisco Tomas Reus to be an honorable individual, a valuable member of my community, and a good human being.

Sincerely,

Elizabeth Vazquez  
Tio Chilo's Grill LLC



**Christopher Caraballo**

2925 35th Avenue Apt C

Oakland, CA 94619

(510)549-5946

christopher.caraballo1@gmail.com

8/25/2021

Dear Honorable Judge,

My name is Christopher Caraballo and I am writing to you on behalf of Francisco Rues. I am a business owner and resident of the bay area and have known Francisco Rues as a friend and past business partner for over 15 years.

Francisco Rues has always displayed a sense of integrity and accountability in all of our business and personal interactions. Frank has always given back to his community through his charitable efforts and youth outreach initiatives. Francisco has also assisted myself and my family in past times of need.

I can attest to Francisco's upstanding character and his sense of remorse given the circumstances he is dealing with. Frank is a positive influence in the community and I hope the court will consider this factor when dealing with his situation moving forward.

Sincerely,

***Christopher Caraballo***

Dear Honorable Judge,

My name is Ricardo Caceres and a Friend of the family.

I'm writing this letter on behalf of Francisco, I've known Francisco for quite some time. He's always been a good man, good father & good husband always Willing to help out in whatever necessary. He was always at his Sons baseball practices and games. He's always worked with the youth of his community. Just an all-around good person. We all make mistakes in life it's how learn from them that makes the us who we are.

I truly believe in my heart Francisco is a good human being and has learned from his mistakes as we all are not perfect. I thank you for the opportunity in listening.

Sincerely,

*Ricardo Caceres*

08/26/2021

Dear Honorable Judge,

My name is Karla Veronica Reus, I have known Francisco for about 40 years, Married to him for 32 years . We share a daughter Antonette who is 30 and our youngest Christian 25. Throughout our time together I have been in the Medical Field for over 30n years as a Certified Medical Assistant. I am currently in school to further my medical education as well as working as an IHSS taking care of my mother as she goes through her 2nd term of Cancer treatment.

As long as I know Francisco, He has always been a hardworking, caring, loyal person. As a father he always made sure our children were taken care of and never were in need. He made sure the kids always participated in school functions, sports, He volunteered his time to coaching from little league and as my son grew into, he's High School years at Sacred Heart. He stayed on helping coach summer camps and recruiting kids for the camps. As a Son In-Law he has been exceptional, He was a great support to my mother from the 1st time she went through her Cancer Treatment to the 2nd Treatment helping with transportation, bringing her food, spending time with her or any type of financial assistance. Six years ago, my husband and I separated and during this time I suffered a tragic accident that left me in a coma in Hawaii. My husband dropped everything to be by my side and I was able to leave the Hospital by The Grace of God, he came back home and helped me recover back to health. This shows the type of man he is to his family, always there in time of need.

It was disappointing and saddening to see these events evolve with him, I know it has affected him greatly. He has dealt with the remorse as well personal injuries he sustained while working for the Union when he got hit by a forklift. Still, he is very active with commitment with Mission Committee HUB Distributing and Delivering food to the homeless, recruiting kids for the baseball camp to Sacred Heart for kids who otherwise would not have access to resources. He has always made himself available to help give back in any way possible.

In my opinion, I feel that Francisco has seen the error of his action and understands the consequences. These past couple years have been tragic for our family with losses, sickness as with the rest of the world. We are learning to appreciate the time we have and see how fortunate time is and it is best to give back. I am proud to say My husband and I are working on reconciling our marriage and with this means change which I am proud they have come and will continue too.

Your Honor, I Thank You for Your Time,

Sincerely,

*Karla Veronica Arana Reus*

Dear Honorable Judge,

My Name is Fatima D. Ortiz, I have been employed with The San Francisco Municipal Transportation Agency for 15 years as a Parking Control Officer Badge #0045. I am writing this letter on behalf of my family friend, Francisco Reus, who I've had the pleasure of knowing for approximately 30 years.

I was troubled to hear about Francisco's recent case as he has always been a rather strong and solid person. It is for this reason I write you this letter. Francisco is an extremely generous and loving person. Sometimes a little too generous but that's what makes him so unique and special to everyone he knows. He truly has a heart of Gold. Ask anyone who knows him, he goes above and beyond for his family and friends. I'm sure you'll receive many letters detailing all the work he's done over the years for others and his community. Some of which include his involvement with Sacred Heart Cathedral Preparatory, baseball camps, Little league and The Mission Food Hub program. This past year Francisco along with The Mission Food Hub went to Fresno, Delano and Bakersfield to deliver over 70,000 pounds of groceries to the farm workers.

Lastly as a practicing Catholic and Catechism Teacher at Church of The Good Shepherd, Pittsburg, CA. I take the role of God Parent very seriously. In 2003 I gave birth to my last child Joseph, who is now 18 Years old. My husband and I chose Francisco, to be his Godfather. My son is now a Peer leader for the Youth program in our Church and a Eucharistic Minister. I owe a lot to who my son has become as a man to his Godfather, Francisco. Francisco, has always been a great example of love and friendship. Always demonstrating his faith in God by his works of charity.

Thank you for your time,

Sincerely,

*Fatima D. Ortiz.*

08/23/2021

Dear Honorable Judge,

Let me take a moment to introduce myself. My name is Barbara J. Harris and I retired from the San Francisco VA Hospital after 30 years in 2019.

I have known Francisco Reus for over 25 years when he moved his family into my apartment building upstairs. Francisco has always been a very nice and respectful person. He would always take a lot of kids in our housing complex to baseball games. He was a hands-on father with his kids' school functions until they became grown. He coached the youth softball and baseball games in South San Francisco for years. He was an excellent mentor to a lot of kids in the neighborhood.

I was disabled for a few years in 2012, and when he dropped his kids off to school, he would come by and bring me coffee and a doughnut almost every morning until I was able to get back on my feet. All I can say about this young man is good things because he is a good person.

If you would like any further information, please feel free to notify me at 415-933-3438.

Respectfully,

*Barbara J. Harris*

Christian Francisco Reus  
3 Goldmine Dr. Apt. D  
San Francisco, Ca 94131

Dear Honorable Judge,

My name is Christian Reus and I am the son of Francisco. I am the second child and only son. I was born and raised in San Francisco and currently still reside in this beautiful city. I attended Sacred Heart Cathedral preparatory for high school where I also played baseball. I was recently laid off from R&L plumbing where I was a plumber technician for 4 years. In my spare time I enjoy snowboarding and doing any outdoor activities with my dog.

My father has always been supportive of both my sisters and my choices for extra curricular activities. I grew a love for baseball as both my dad and uncle once played for themselves and taught me. My fondest memories of my dad and I were going to a Giants game and seeing some of my favorite players. I began playing baseball at the age of 5 where my dad was one of my coaches. Having him on first base cheering me on will always be a memory I will cherish. I wasn't old enough yet to attend , but I remember my dad would bring me along to the Sacred Hearts summer camps where he helped teach and improve skills to kids who loved baseball. I couldn't wait till I was of age and was able to go out there and play myself. Till then I was thrilled to be there alongside my dad doing something together that we both loved. My dad was right there with me throughout my baseball career which was a lot. I played all year round and constantly practiced. My dad was always there and always made sure to be there for my sister and her games as she too was an athlete. Every summer you could find me at Sacred Hearts baseball camp. I would see my dad helping families that couldn't afford the camp by holding fundraisers and working with the school to help provide discounts so that every kid that wanted to attend could. Seeing his passion and charitability towards the sport and these kids was everything and inspired me to do the same in the summer during my highschool career as well after.

That was the type of man my father is, he puts others before himself. Especially the kids. My dad is a huge advocate for children being in sports and helped in any way he could to get them into a sport they loved. He wanted to do more and that was when he decided to volunteer at the Mission Hub. Three days out of the week for the past year you can find my dad at the Hub gathering groceries, loading trucks, or delivering food and other necessities to those less fortunate or unable to go and get it themselves. My father is a very loving man your Honor. He's selfless , caring, giving, and so much more. Allow him to continue to help the community and do good in our community. There aren't many people like him. Let him be there for his family and show how kind of a man he is.

I know my father has made some mistakes and as cliché as it may sound haven't we all? He understands what he has done and the consequences that are resulting from his mistakes. Allow him the chance to better himself as a father, friend, and server to the community. Thank you for your time your Honor.

Christian Reus

A handwritten signature in blue ink, appearing to read 'C. Reus', with a long horizontal flourish extending to the right.



Donald Mamea &lt;donaIdmamea@gmail.com&gt;

---

**A letter for a friend....**

1 message

---

**Donald Mamea** <donaIdmamea@gmail.com>

Thu, Sep 9, 2021 at 5:11 PM

To: frankr1967@gmail.com

Dear Honorable Judge, my name is Donald Mamea. I am an active teamster and have been since 1996. I first met Frank in 2002 while coaching little league world. It was there that I saw Frank giving for the kids selfless. If anyone had a fundraiser you could always count on Frank to be there or participating. We started working together and we became good friends. He was there for me when my father was passing of cancer earlier this year. He got my father a statue of the saints of cancer. It really gave my dad hope. When he passed the statue was by his bedside. I never got to thank Frank but I will. He doesn't know but I continue to go to church every Sunday. He inspired my family. Be close to your family. You never know when your time is up. Frank has been a good union worker for many years. Always active with the community. If you need a helping hand.....call Frank! Best Regards your honor.

Donald Mamea.

A handwritten signature in blue ink, appearing to read 'Donald Mamea'.



Antonette Nicole Reus  
6650 Prue RD. #733  
San Antonio , Texas 78240

Dear Honorable Judge,

My name is Antonette Reus. I am the eldest child and daughter of Francisco Reus. I am 30 years old residing in Texas where I work as a behavioral therapist primarily working with children on the spectrum. I am currently working on receiving my undergrad with a degree in psychology with the hopes of getting a Masters in Applied Behavioral Analysis. With this degree I will receive my BCBA continuing my career in working with children on the spectrum.

I want to speak a little about my father and the type of man he is and has been throughout my life. My dad has always been in my life. Never have I gone a day while living under the same roof as him and seen him as an absent parent. It was quite the opposite in fact. He pushed my brother and myself to follow what we wanted to do as long as to remember that school came first. Growing up as an athlete it only made sense that my brother and I would follow in his footsteps and become one ourselves. Because of my dads constant encouragement and help, I was able to push myself to join teams such as club volleyball and basketball. Traveling throughout the Bay Area it was my dad that would take me practice and games, waking up in the early mornings and staying to watch me play for hours. Fortunately , I can say that he did the same with my brother and all while making sure that neither one of us felt his absence. He dedicated his life to us and still does. I can't say the same for many others I know.

My father is a family man. He never puts himself first , and in fact will always make sure that his kids are taken care of before he is. I have always known my father as loyal. Loyal to those who love him and those in need of him. It didn't surprise me when I found out my dad was working at the Mission HUB. That is who he is. My dad is the type of person who pulls over next to a homeless man and goes into his trunk pulling clothes and jackets from his freshly washed laundry to help another man in need. I've seen this first hand and I doubt it was the last time. The heart this man has is so big and so pure, no one can mistake it for anything other. It makes sense that he would find ways to give back to the community.

You see your Honor, dad puts himself before others. Always has and I believe he always will. He is the friend you can count on to be there for you whether it be small or big. My father is loved by many and they would all have something positive to say about the man and loyal friend that he is. My dad has always been very giving to those around him. Since I can remember my dad was the type to help those in need. He builds relationships with people who just like him like to help those in need and less fortunate. My dad would hold fundraisers to help children attend baseball camp for families with children who loved the sport but couldn't afford the program.

Your Honor, I am not excusing what my dad has done by any means. I believe my father is remorseful for his actions. I also believe if given the opportunity my father will continue to do good and continue to help the community in any way he can. Give him the chance to help change lives, to be there for his children. Give him the chance to become a better man not only for himself but for his family as well. I truly appreciate your time.

Yours truly ,

Antonette Reus

A handwritten signature in blue ink, appearing to read "Antonette Reus", with a small dot at the end.